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8 *Counsel for Plaintiff International Fur Trade Federation*

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10
11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA

13
14 INTERNATIONAL FUR TRADE
15 FEDERATION, an unincorporated
16 association;

17 Plaintiff,

18 – against –

19 CITY AND COUNTY OF SAN
20 FRANCISCO; and

21 DR. GRANT COLFAX, an individual, in
22 his official capacity as Director of the
23 San Francisco Department of Public
24 Health;

25 Defendants.

Case No. 3:20-cv-00242-RS

**DECLARATION OF ROBERT
ZIMBAL IN SUPPORT OF
PLAINTIFF'S MOTION FOR
SUMMARY JUDGMENT**

Date: July 2, 2020
Time: 1:30 p.m.
Courtroom: 3

Hon. Richard Seeborg

1 I, Robert Zimbal, declare as follows:

2 1. My family owns and operates Zimbal Minkery (“Zimbal”), founded in
3 1954 in Sheboygan Falls, Wisconsin. Our farm is one of the largest mink producers in
4 the United States. The Zimbal family takes pride in raising the highest-quality mink in
5 the world, and has won many awards at industry events for the quality of our mink. Our
6 awards have included everything from top lots at the auction houses to best mink
7 awards at international mink show events.

8 2. Zimbal must comply with all Wisconsin laws concerning the operation of
9 our farm, including, of course, all such laws regarding the treatment of our animals and
10 our environmental responsibilities. On top of these laws, Zimbal is a member of Fur
11 Commission USA (“FCUSA”) and is certified through FCUSA to be in compliance
12 with the “Standard Guidelines for the Operation of Mink Farms in the United States”
13 (the “Standards”). The Standards exceed our legal requirements for humane treatment
14 in all aspects of our farming, including vigilant attention to nutritional needs; clean,
15 safe, and appropriate housing; prompt veterinary care; consideration for the animal’s
16 disposition and reproductive needs; and elimination of outside stress. As a certified
17 farm, Zimbal’s mink are raised in compliance with these Standards.

18 3. Zimbal’s animal welfare practices also contribute to environmental
19 sustainability in Wisconsin. For example, Zimbal minks’ food consists of byproducts
20 from local businesses in the food industry that would otherwise go to a landfill. Zimbal
21 uses the minks’ waste as a natural fertilizer for our and other farmers’ fields of corn,
22 grain, and soybeans. Zimbal sells the minks’ carcasses to rendering facilities, where the
23 resulting oil is used in cosmetics and the rest of the carcass is turned into natural
24 additives for the pet food industry as well as used for biodiesel.

25 4. Zimbal’s mink pelts are sold through the fur industry’s three major auction
26 houses: the North American Fur Auction (“NAFA”) (until recently), located in Canada;
27 SAGA Furs, located in Finland; and Copenhagen Fur, located in Denmark. Zimbal
28 pelts are purchased at those auctions by manufacturers such as Reich Furs and

1 Pologeorgis Furs, both family-owned businesses located in New York, who make them
2 into fur products and sell them to retailers all over the United States, including through
3 retailers like Neiman Marcus and Saks Fifth Avenue.

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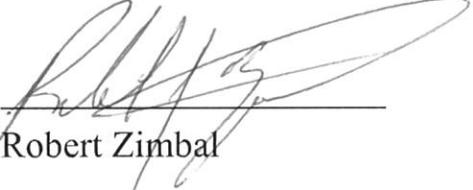
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1 I declare under penalty of perjury under the laws of the United States that the
2 foregoing is true and correct.

3 Dated: May 15, 2020

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Robert Zimbal

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